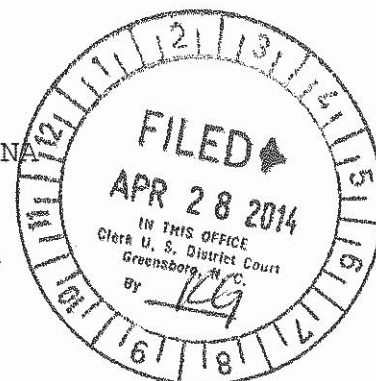


IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA



UNITED STATES OF AMERICA	:	SUPERSEDING
	:	
v.	:	
	:	
JERMAINE LAMONT JENKINS,	:	1:13CR487-1
also known as "Twin"	:	
CEDRIC DEWIN JENKINS	:	1:13CR487-2
DORICK TAVARES HUNT	:	1:13CR487-3
KEVIN KEYS,	:	1:13CR487-4
also known as "Swag"	:	
ELIZABETH ANN WOLFORD	:	1:13CR487-6

The Grand Jury charges:

COUNT ONE

1. At all times herein material, State Employees' Credit Union and all of its branches ("SECU") were financial institutions, the accounts of which were insured by the National Credit Union Administration.

2. At all times herein material, SunTrust Banks, Incorporated and all of its branches ("SunTrust Bank") were financial institutions, the deposits of which were insured by the Federal Deposit Insurance Corporation.

3. At all times herein material, Wells Fargo Bank, N.A., and all of its branches ("Wells Fargo") were financial institutions, the deposits of which were insured by the Federal Deposit Insurance Corporation.

4. At all times herein material, First Federal and all of its branches ("First Federal") were financial institutions, the deposits of which were insured by the Federal Deposit Insurance Corporation.

5. At all times herein material, Peoples National Bank and all of its branches ("Peoples National Bank") were financial institutions, the deposits of which were insured by the Federal Deposit Insurance Corporation.

6. At all times herein material, Renasant Bank and all of its branches ("Renasant Bank") were financial institutions, the deposits of which were insured by the Federal Deposit Insurance Corporation.

7. At all times herein material, M & T Bank and all of its branches ("M & T Bank") were financial institutions, the deposits of which were insured by the Federal Deposit Insurance Corporation.

8. At all times herein material, Allegacy Federal Credit Union and all of its branches ("Allegacy") were financial institutions, the accounts of which were insured by the National Credit Union Administration.

9. At all times herein material, OBX Bank and all of its branches ("OBX Bank") were financial institutions, the deposits of which were insured by the Federal Deposit Insurance Corporation.

10. At all times herein material, First Citizens Bank and all of its branches ("First Citizens Bank") were financial institutions, the deposits of which were insured by the Federal Deposit Insurance Corporation.

11. At all times herein material, Bank of America Corporation and all of its branches ("Bank of America") were financial institutions, the deposits of which were insured by the Federal Deposit Insurance Corporation.

12. At all times herein material, the term "means of identification" means any name or number that may be used, alone or in conjunction with any other information, to identify a specific individual, including, without limitation, addresses, names, dates of birth, Social Security numbers, checking account numbers, and unique electronic numbers.

13. From on or about January 2, 2012, continuing up to and including the present, the exact dates to the Grand Jurors unknown, in the Counties of Cabarrus and Forsyth, in the Middle District of North Carolina, and elsewhere, JERMAINE LAMONT JENKINS, also known as "Twin," CEDRIC DEWIN JENKINS, DORICK TAVARES HUNT, KEVIN KEYS, also known as "Swag," Vickie Lynn Brantley, ELIZABETH ANN WOLFORD, and divers other persons, known and unknown to the Grand Jurors, knowingly, willfully, and unlawfully did conspire, combine, confederate and agree to commit offenses against the United States, that is:

a. To devise and intend to devise a scheme and artifice to obtain moneys, funds, credits, and other property owned by and under the custody and control of financial institutions, by means of material false and fraudulent pretenses, representations, and promises; and

b. To knowingly possess and use, without lawful authority, the means of identification of another person, that is, the driver's licenses, United States passports, United States legal permanent resident cards, debit cards, check cards, and checking account numbers of various individuals, during and in relation to felonies enumerated in Title 18, United States Code, Section 1028A(c), to wit: conspiracy to commit bank fraud, in violation of Title 18, United States Code, Section 1349, and bank fraud, in violation of Title 18, United States Code, Section 1344(2).

METHOD AND MEANS

14. It was a part of the conspiracy that the co-conspirators would and did travel to various locations in the Middle District of North Carolina and elsewhere in order to unlawfully obtain certain means of identification of individual victims, including, but not limited to: driver's licenses, United States passports, United States legal permanent resident cards, Social Security numbers, dates of birth, addresses, debit card numbers, credit card numbers, and checkbooks.

15. It was a further part of the conspiracy that the co-conspirators would and did write checks from the checkbooks of one of the victims (the "first victim") to another victim (the "second victim").

16. It was a further part of the conspiracy that the co-conspirators would and did enlist various females, including but not limited to co-conspirators Vickie Lynn Brantley and ELIZABETH ANN WOLFORD, to pose as the second victim and cash the check drawn on the checking account of the first victim at the drive-through teller window of a bank where the second victim held an account.

17. It was a further part of the conspiracy that the female posing as the second victim would use the second victim's unlawfully obtained means of identification as a form of verifying identification when cashing a fraudulently-issued check.

18. It was a further part of the conspiracy that the female posing as the second victim would often employ various means of disguise, such as a wig, so to appear more physically similar to the second victim, as pictured in the unlawfully obtained form of photo identification.

19. It was a further part of the conspiracy that the co-conspirators instructed the female cashing the check to use the farthest drive-through lane from the bank teller window so as to

hinder the bank teller's ability to compare the female's physical appearance with that of the second victim, as pictured in the unlawfully obtained form of photo identification.

20. It was a further part of the conspiracy that other co-conspirators would and did wait in a separate vehicle from the female posing as the second victim in order to monitor for the potential arrival of law enforcement.

21. It was a further part of the conspiracy that the co-conspirators often would and did switch vehicles after each attempt to cash a check was made, regardless of whether such attempt was successful or not, in order to avoid potential detection.

22. It was a further part of the conspiracy that the co-conspirators would and did drive rental vehicles rather than personal vehicles in order to avoid potential detection.

23. It was a further part of the conspiracy that the co-conspirators would and did obstruct the visibility of defining characteristics of the license plate of rental vehicles in the drive-through bank teller lane to avoid potential detection.

24. It was a further part of the conspiracy that the co-conspirator purporting to be the second victim would receive a percentage of the genuine currency obtained, and other co-conspirators would keep the remaining balance.

25. It was a further part of the conspiracy that the co-conspirators would and did drive to various banks in various states and fraudulently cash stolen checks using the stolen means of identification of real individuals.

EXECUTION

26. On or about January 2, 2012, in the County of Buncombe, in the Western District of North Carolina, JERMAINE LAMONT JENKINS, also known as "Twin," and KEVIN KEYS, also known as "Swag," unlawfully obtained the means of identification of an individual whose initials are K.L., for use in executing the scheme to defraud.

27. On or about January 23, 2012, in the County of Greenville, in the District of South Carolina, JERMAINE LAMONT JENKINS, also known as "Twin," KEVIN KEYS, also known as "Swag," and Vickie Lynn Brantley did knowingly execute and attempt to execute a scheme and artifice to obtain moneys, funds and property owned by and under the custody and control of SunTrust Bank, by means of material false and fraudulent pretenses, representations and promises, by presenting multiple checks issued to an individual whose initials are K.L., drawn on an account at Peoples National Bank ending with 3083, belonging to individuals whose initials are T.P. and C.P., and purporting to be signed by one of those individuals, but bearing a forged

signature, for the procurement of approximately \$4,100.00 of genuine United States currency.

28. At a time unknown to the Grand Jurors but prior to January 27, 2012, JERMAINE LAMONT JENKINS, also known as "Twin," KEVIN KEYS, also known as "Swag," and Vickie Lynn Brantley did unlawfully possess means of identification of individuals whose initials are: J.O., J.D., K.H., J.B., B.W., R.R., K.A., and E.S.

29. On or about September 11, 2012, in the County of Forsyth, in the Middle District of North Carolina, the co-conspirators did unlawfully obtain the means of identification for an individual whose initials are V.L., for use in executing the scheme to defraud.

30. On or about September 18, 2012, in the County of Chesterfield, in the Eastern District of Virginia, JERMAINE LAMONT JENKINS, also known as "Twin," CEDRIC DEWIN JENKINS, and DORICK TAVARES HUNT were detained and found to be in possession of approximately \$8,874.00, \$14,000.00, and \$15,285.00 of genuine United States currency, respectively.

31. On or about September 18, 2012, in the City of Richmond, in the Eastern District of Virginia, JERMAINE LAMONT JENKINS, also known as "Twin," CEDRIC DEWIN JENKINS, DORICK TAVARES HUNT, and ELIZABETH ANN WOLFORD did knowingly execute and attempt to execute a scheme and artifice to obtain moneys, funds and property owned by and under the custody and control of

SunTrust Bank, by means of material false and fraudulent pretenses, representations and promises, by presenting a check issued to an individual whose initials are D.L., drawn on an account at First Citizens Bank ending with 7882, belonging to individuals whose initials are R.M. and C.M. and purporting to be signed by one of those individuals, but bearing a forged signature, for the procurement of \$1,875.00 in genuine United States currency.

32. On or about September 19, 2012, in the City of Richmond and the County of Chesterfield, in the Eastern District of Virginia, JERMAINE LAMONT JENKINS, also known as "Twin," CEDRIC DEWIN JENKINS, DORICK TAVARES HUNT, and ELIZABETH ANN WOLFORD did knowingly execute and attempt to execute a scheme and artifice to obtain moneys, funds and property owned by and under the custody and control of SunTrust Bank, by means of material false and fraudulent pretenses, representations and promises, by presenting multiple checks issued to an individual whose initials are D.L., drawn on an account at the State Employees' Credit Union ending with 1612, belonging to an individual whose initials are M.W. and purporting to be signed by that individual, but bearing a forged signature, for the procurement of approximately \$4,900.00 in genuine United States currency.

33. From on or about September 19, 2012, continuing up to and including on or about September 21, 2012, in the City of Richmond and the County of Chesterfield, in the Eastern District of Virginia, JERMAINE LAMONT JENKINS, also known as "Twin," CEDRIC DEWIN JENKINS, DORICK TAVARES HUNT, and ELIZABETH ANN WOLFORD did knowingly execute and attempt to execute a scheme and artifice to obtain moneys, funds and property owned by and under the custody and control of SunTrust Bank, by means of material false and fraudulent pretenses, representations and promises, by presenting multiple checks issued to an individual whose initials are D.L., drawn on an account at First Citizens Bank ending with 7882, belonging to individuals whose initials are R.M. and C.M. and purporting to be signed by one of those individuals, but bearing a forged signature, for the procurement of approximately \$5,675.00 in genuine United States currency.

34. On or about September 25, 2012, in the City of Newport News and the County of York, in the Eastern District of Virginia, JERMAINE LAMONT JENKINS, also known as "Twin," CEDRIC DEWIN JENKINS, DORICK TAVARES HUNT, and ELIZABETH ANN WOLFORD did knowingly execute and attempt to execute a scheme and artifice to obtain moneys, funds and property owned by and under the custody and control of Bank of America, by means of material false and fraudulent pretenses, representations and promises, by presenting multiple checks issued to an individual whose

initials are T.W., drawn on an account at Renasant Bank ending with 0455, belonging to individuals whose initials are J.R. and P.Y. and purporting to be signed by one of those individuals, but bearing a forged signature, for the procurement of approximately \$3,500.00 in genuine United States currency.

35. On or about November 10, 2012, in the County of Forsyth, in the Middle District of North Carolina, the co-conspirators did unlawfully obtain the means of identification for an individual whose initials are M.C., for use in executing the scheme to defraud.

36. From or about December 19, 2012, continuing up to and including on or about December 20, 2012, in the Counties of Sussex and Dover, in the District of Delaware, JERMAINE LAMONT JENKINS, also known as "Twin," CEDRIC DEWIN JENKINS, DORICK TAVARES HUNT, and ELIZABETH ANN WOLFORD did knowingly execute and attempt to execute a scheme and artifice to obtain moneys, funds and property owned by and under the custody and control of M & T Bank, by means of material false and fraudulent pretenses, representations and promises, by presenting multiple checks issued to an individual whose initials are A.M., drawn on an account at Wells Fargo ending with 4175, belonging to individuals whose initials are N.L. and B.L. and purporting to be signed by one of those individuals, but bearing a forged

signature, for the procurement of approximately \$2,935.00 in genuine United States currency.

37. On or about January 21, 2013, in the County of Cabarrus, in the Middle District of North Carolina, the co-conspirators did unlawfully obtain the means of identification for an individual whose initials are W.R., for use in executing the scheme to defraud.

38. On or about January 22, 2013, in the County of DeKalb, in the Northern District of Georgia, the co-conspirators did unlawfully obtain the means of identification for an individual whose initials are P.W., for use in executing the scheme to defraud.

39. On or about February 7, 2013, in the County of Greenville, in the District of South Carolina, ELIZABETH ANN WOLFORD and KEVIN KEYS, also known as "Swag," did unlawfully possess the means of identification of individuals whose initials are A.M., Y.W., H.S., M.M., D.M., C.H., W.R., K.L., N.L., A.W., N.L., S.B., V.L., J.R., T.D., M.G., A.G., L.J., K.B., E.R., M.B., K.R., D.T., L.T., and P.W.

40. On or about March 3, 2013, in the County of Mecklenburg, in the Western District of North Carolina, the co-conspirators did unlawfully obtain the means of identification of an individual whose initials are E.B., for use in executing the scheme to defraud.

41. On or about March 3, 2013, in the County of Mecklenburg, in the Western District of North Carolina, the co-conspirators did unlawfully obtain the means of identification of an individual whose initials are B.N., for use in executing the scheme to defraud.

42. On or about March 20, 2013, in the County of Granville, in the Eastern District of North Carolina, CEDRIC DEWIN JENKINS, DORICK TAVARES HUNT, and Unindicted Co-Conspirator 1 ("CC-1") were detained and found in possession of a "window center punch," leather gloves, a crowbar, the means of identification of an individual whose initials are E.B., two personal checks drawn on the respective checking accounts of individuals whose initials are B.N. and C.Q. and made payable to that same individual whose initials are E.B., and genuine United States currency totaling approximately \$6,550.00.

43. On or about May 5, 2013, in the County of Camden, in the Southern District of Georgia, CEDRIC DEWIN JENKINS, DORICK TAVARES HUNT and CC-1 were detained and found in possession of genuine United States currency totaling approximately \$11,491.00.

All in violation of Title 18, United States Code, Section 1349.

COUNT TWO

1. Paragraphs One through Forty-Three of Count One are hereby re-alleged and incorporated by reference as if set forth in full herein.

2. On or about September 11, 2012, in the County of Forsyth, in the Middle District of North Carolina, during and in relation to a felony enumerated in Title 18, United States Code, Section 1028A(c), to wit: conspiracy to commit bank fraud, in violation of Title 18, United States Code, Section 1349, as alleged in Count One and incorporated by reference herein, JERMAINE LAMONT JENKINS, also known as "Twin," CEDRIC DEWIN JENKINS, DORICK TAVARES HUNT, KEVIN KEYS, also known as "Swag," and ELIZABETH ANN WOLFORD, knowingly did possess and use, without lawful authority, the means of identification of another person, that is, the state driver's license of an individual whose initials are V.L.; in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

COUNT THREE

1. Paragraphs One through Forty-Three of Count One are hereby re-alleged and incorporated by reference as if set forth in full herein.

2. On or about November 15, 2012, in the County of Cabarrus, in the Middle District of North Carolina, JERMAINE LAMONT JENKINS, also known as "Twin," CEDRIC DEWIN JENKINS,

DORICK TAVARES HUNT, and ELIZABETH ANN WOLFORD did knowingly execute and attempt to execute a scheme and artifice to obtain moneys, funds, and property owned by and under the custody and control of First Citizens Bank, by means of material false and fraudulent pretenses, representations, and promises, by presenting a check issued to an individual whose initials are C.M., drawn on an account at Allegacy ending with 0102, belonging to an individual whose initials are C.P. and purporting to be signed by that individual, but bearing a forged signature, for the procurement of \$1,850.00 in genuine United States currency.

All in violation of Title 18, United States Code, Sections 1344(2) and 2.

COUNT FOUR

1. Paragraphs One through Forty-Three of Count One are hereby re-alleged and incorporated by reference as if set forth in full herein.

2. On or about November 15, 2012, in the County of Cabarrus, in the Middle District of North Carolina, during and in relation to a felony enumerated in Title 18, United States Code, Section 1028A(c), to wit: bank fraud, in violation of Title 18, United States Code, Section 1344(2), as alleged in Count Three and incorporated by reference herein, JERMAINE LAMONT JENKINS, also known as "Twin," CEDRIC DEWIN JENKINS,

DORICK TAVARES HUNT, and ELIZABETH ANN WOLFORD did knowingly did possess and use, without lawful authority, the means of identification of another person, that is, the checking account number of an individual whose initials are C.P.; in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

COUNT FIVE

1. Paragraphs One through Forty-Three of Count One are hereby re-alleged and incorporated by reference as if set forth in full herein.

2. On or about November 15, 2012, in the County of Cabarrus, in the Middle District of North Carolina, JERMAINE LAMONT JENKINS, also known as "Twin," CEDRIC DEWIN JENKINS, DORICK TAVARES HUNT, and ELIZABETH ANN WOLFORD did knowingly execute and attempt to execute a scheme and artifice to obtain moneys, funds and property owned by and under the custody and control of First Citizens Bank, by means of material false and fraudulent pretenses, representations and promises, by presenting a check issued to an individual whose initials are C.M., drawn on an account at OBX Bank ending with 1407, belonging to an organization whose initials are N.L. and purporting to be signed by an authorized signatory of that organization, but bearing a forged signature, for the procurement of \$1,700.00 in genuine United States currency.

All in violation of Title 18, United States Code, Sections 1344(2) and 2.

COUNT SIX

1. Paragraphs One through Forty-Three of Count One are hereby re-alleged and incorporated by reference as if set forth in full herein.

2. On or about November 15, 2012, in the County of Cabarrus, in the Middle District of North Carolina, during and in relation to a felony enumerated in Title 18, United States Code, Section 1028A(c), to wit: bank fraud, in violation of Title 18, United States Code, Section 1344(2), as alleged in Count Five and incorporated by reference herein, JERMAINE LAMONT JENKINS, also known as "Twin," CEDRIC DEWIN JENKINS, DORICK TAVARES HUNT, and ELIZABETH ANN WOLFORD did knowingly did possess and use, without lawful authority, the means of identification of another person, that is, the state driver's license number of an individual whose initials are C.M.; in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

COUNT SEVEN

1. Paragraphs One through Forty-Three of Count One are hereby re-alleged and incorporated by reference as if set forth in full herein.

2. On or about November 15, 2012, in the County of Cabarrus, in the Middle District of North Carolina, JERMAINE LAMONT JENKINS, also known as "Twin," CEDRIC DEWIN JENKINS, DORICK TAVARES HUNT, and ELIZABETH ANN WOLFORD did knowingly execute and attempt to execute a scheme and artifice to obtain moneys, funds and property owned by and under the custody and control of Bank of America, by means of material false and fraudulent pretenses, representations and promises, by presenting a check issued to an individual whose initials are G.H., drawn on an account at First Federal Bank ending with 7202, belonging to an individual whose initials are L.C. and purporting to be signed by that individual, but bearing a forged signature, for the procurement of \$1,800.00 in genuine United States currency.

All in violation of Title 18, United States Code, Sections 1344(2) and 2.

COUNT EIGHT

1. Paragraphs One through Forty-Three of Count One are hereby re-alleged and incorporated by reference as if set forth in full herein.

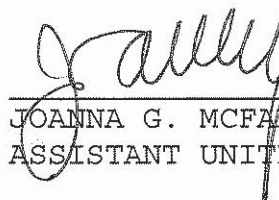
2. On or about November 15, 2012, in the County of Cabarrus, in the Middle District of North Carolina, during and in relation to a felony enumerated in Title 18, United States Code, Section 1028A(c), to wit: bank fraud, in violation of

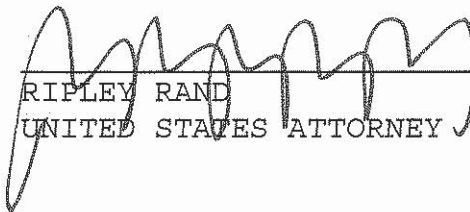
Title 18, United States Code, Section 1344(2), as alleged in Count Seven and incorporated by reference herein, JERMAINE LAMONT JENKINS, also known as "Twin," CEDRIC DEWIN JENKINS, DORICK TAVARES HUNT, and ELIZABETH ANN WOLFORD did knowingly did possess and use, without lawful authority, the means of identification of another person, that is, the name of an individual whose initials are G.H.; in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

A TRUE BILL:



FOREPERSON


JOANNA G. MCFADDEN
ASSISTANT UNITED STATES ATTORNEY


RIPLEY RAND
UNITED STATES ATTORNEY